

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROBERT ALLEN BAUTISTA,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
SANTANDER CONSUMER USA, AUDI	§	Case No. _____
HENDERSON, EQUIFAX INC.,	§	
EXPERIAN CORPORATION, and	§	
TRANSUNION,	§	
	§	
Defendants.	§	

DEFENDANT TRANS UNION LLC’S NOTICE OF REMOVAL

Defendant Trans Union LLC (“Trans Union”), incorrectly named TransUnion files this Notice of Removal pursuant to 28 U.S.C. § 1446(a), and in support thereof would respectfully show the Court as follows:

A. PROCEDURAL BACKGROUND

1. On October 25, 2024, Plaintiff Robert Allen Bautista (“Plaintiff”) filed his Original Petition, alleging securities fraud, violations of the Fair Credit Reporting Act (“FCRA”), violations of the Fair and Accurate Credit Transactions Act (“FACTA”), misrepresentation, and peonage (“Petition”) in the 162nd District Court of Dallas County, Texas, under Case No. DC-24-18871 (“State Court Action”).

2. Trans Union was served with Plaintiff’s Petition on November 1, 2024. This Notice of Removal is being filed within the 30-day time period required by 28 U.S.C. § 1446(b).

B. GROUNDS FOR REMOVAL

3. The present suit is an action over which the United States District Court – Northern District of Texas has original jurisdiction pursuant to 28 U.S.C. § 1331 as it is a civil action founded on a claim or right arising under the laws of the United States and may be removed to this Court by Trans Union pursuant to the provisions of 28 U.S.C. § 1446(b).

Removal is proper because Plaintiff's claims present a federal question. *See* 28 U.S.C. §§ 1331 and 1441(a). In the Petition, Plaintiff seeks damages for alleged violations of the FCRA and FACTA, among others.

C. COMPLIANCE WITH PROCEDURAL REQUIREMENTS

4. Pursuant to 28 U.S.C. § 1441(a), venue of the removal action is proper in this Court because it is in the district and division embracing the place where the state court action is pending.

5. On the same day that this Notice of Removal is filed, Trans Union will give written notice of the removal to Plaintiff and will file a copy of this Notice of Removal with the Clerk of the 162nd District Court of Dallas County, Texas, as required by 28 U.S.C. § 1446(d).

6. In accordance with 28 U.S.C. § 1446(a), a copy of all executed process, pleadings asserting causes of action, and orders in the State Court Action served upon Trans Union are attached hereto as **Exhibit A**.

7. In accordance with 28 U.S.C. § 1446(b), Santander Consumer USA's Joinder and Consent to Removal is attached hereto as **Exhibit B**.¹

WHEREFORE, PREMISES CONSIDERED, Trans Union LLC, hereby gives notice that this action is removed to this, the United States District Court for the Northern District of Texas, Dallas Division, and requests that it receive such other and further relief to which it may show itself justly entitled at law or in equity.

¹ Upon information and belief, Defendants Experian Information Solutions, Inc. ("Experian"), Equifax, Inc. ("Equifax"), and Audi Henderson ("Audi") have not been properly served in this matter, but the undersigned counsel for Trans Union is authorized to represent that if they are served in the future, Experian, Equifax, and Audi do not object to removal.

Respectfully submitted,

/s/ Heliane Fabian

HELIANE FABIAN

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**QUILLING, SELANDER, LOWNDS,
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Counsel for Trans Union LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of November 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

None.

I hereby certify that I have mailed by United States Postal Service the above and foregoing document to the following non-CM/ECF participants:

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Pro Se Plaintiff

/s/ Heliane Fabian
HELIANE FABIAN